

1 TOMAS C. LEON  
2 (CA SBN 321117)  
3 [tommie@leon.law](mailto:tommie@leon.law)  
4 (909) 616-5969  
5 LEON LAW, LLP  
6 1145 W. 55<sup>th</sup> Street  
7 Los Angeles, CA 90037  
8 Attorney for Plaintiff

9 UNITED STATES DISTRICT COURT  
10 CENTRAL DISTRICT OF CALIFORNIA

11 GS HOLISTIC, LLC,  
12 Plaintiff,

No. 2:24-cv-05154

13 v.

**COMPLAINT FOR INJUNCTIVE  
RELIEF AND DAMAGES**

14 G&M TOBACCO INC d/b/a  
15 SHERMAN SMOKE SHOP, GAITH  
16 SLIKA, and MATANOOS NASSAR  
17 Defendant.

18 The Plaintiff, GS HOLISTIC, LLC (hereinafter referred to as “GS”), by and  
19 through its undersigned counsel, hereby files this, its Complaint against the  
20 Defendants, G&M TOBACCO INC d/b/a SHERMAN SMOKE SHOP, GAITH  
21 SLIKA, and MATANOOS NASSAR (collectively, “Defendants”), and alleges, as  
22 follows:

23 **Jurisdictional Allegations**

24 1. This is a civil action against the Defendants for trademark infringement,  
25 counterfeiting, and false designation of origin and unfair competition, under the  
26 Lanham Act (15 U.S.C. § 1051 *et. seq.*).  
27  
28

## Venue

## Parties

5. G&M TOBACCO INC d/b/a SHERMAN SMOKE SHOP (hereinafter referred to as “SHERMAN SMOKE SHOP”) is a corporation that was organized and existing under the laws of the State of California and has its principal place of business at 17745 Sherman Way, Reseda, CA 91335. GAITH SLIKA owns and

1 operates the SHERMAN SMOKE SHOP at that location. SHERMAN SMOKE  
2 SHOP is a citizen of California.

3  
4 6. GAITH SLIKA is domiciled in and a resident of Reseda, California, and  
5 is *sui juris*. GAITH SLIKA is a citizen of California and regularly conducts and  
6 solicits business in the State of California (including this Judicial District). GAITH  
7 SLIKA is the owner of, G&M TOBACCO INC d/b/a SHERMAN SMOKE SHOP.  
8 GAITH SLIKA controls and directs the activities, including the infringing activities,  
9 of Defendant G&M TOBACCO INC d/b/a SHERMAN SMOKE SHOP.  
10  
11

12 **Facts Common to All Counts**

13  
14 **The History of The Stündenglass Brand.**

15 7. Since 2020, GS has marketed and sold products using the well-known  
16 trademark “Stündenglass.” The Stündenglass branded products, such as Gravity  
17 Infusers and accessories related thereto, are widely recognized nationally and  
18 internationally. Indeed, the Stündenglass brand is one of the leading companies in  
19 the industry, known for high quality and innovation of products.  
20  
21

22 8. For approximately four years, GS has worked to distinguish the  
23 Stündenglass brand as the premier manufacturer of Gravity Infusers by emphasizing  
24 the brand’s unwavering use of quality materials and focusing on scientific principles  
25 which facilitate a superior infusing experience. Stündenglass branded products  
26 embody a painstaking attention to detail, which is evident in many facets of authentic  
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1 Stündenglass branded products. It is precisely because of the unyielding quest for  
2 quality and unsurpassed innovation that Stündenglass branded products have a  
3 significant following and appreciation amongst consumers in the United States and  
4 internationally.  
5

6 9. As a result of the continuous and extensive use of the trademark  
7 “STÜNDENGLASS,” GS was granted both valid and subsisting federal statutory and  
8 common law rights to the Stündenglass trademark.  
9

10 10. GS is the rightful owner of United States trademarks, which are  
11 registered on the Principal Register. The following is a list of GS’s relevant federally  
12 registered trademarks:  
13

14 a. U.S. Trademark Registration Number 6,633,884 for the standard  
15 character mark “Stündenglass” in association with goods further identified in  
16 registration in international class 011 .  
17

18 b. U.S. Trademark Registration Number 6,174,292 for the design  
19 plus words mark “S” and its logo in association with goods further identified  
20 in the registration in international class 034.  
21

22 c. U.S. Trademark Registration Number 6,174,291 for the standard  
23 character mark “Stündenglass” in association with goods further identified in  
24 registration in international class 034.  
25

1           11. The above U.S. registrations are valid, subsisting and in full force and  
2 effect. True and correct copies of the Trademark Registrations are attached hereto  
3 and marked as Exhibit “A.” Hereinafter, GS utilizes the phrase “Stündenglass Marks”  
4 to refer to, collectively, GS’s federally registered, above-listed trademarks.  
5

6 **The Stündenglass Brand in the United States.**  
7

8           12. GS has used the Stündenglass Marks in commerce throughout the  
9 United States, continuously, since 2020, in connection with the manufacturing and  
10 sale of Gravity Infusers and accessories.  
11

12           13. The Stündenglass Marks are distinctive to both the consuming public  
13 and the Plaintiff’s trade. GS’s Stündenglass branded products are made from  
14 superior materials. The superiority of Stündenglass branded products is not only  
15 readily apparent to consumers, but to industry professionals as well.  
16  
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18           14. The Stündenglass Trademarks are exclusive to GS and appear clearly  
19 on GS’s Stündenglass Products, as well as on the packaging and advertisements  
20 related to the products. GS has expended substantial time, money, and other resources  
21 in developing, advertising, and otherwise promoting and protecting these  
22 Trademarks. As a result, products bearing GS’s Stündenglass Trademarks are widely  
23 recognized and exclusively associated by consumers, the public, and the trade as  
24 being high-quality products sourced from GS.  
25  
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1           15. GS's Stündenglass Products have become some of the most popular of  
2 their kind in the world and have also been the subject of extensive unsolicited  
3 publicity resulting from their high-quality and innovative designs. Because of these  
4 and other factors, the GS brand, the Stündenglass brand, and GS's Stündenglass  
5 Trademarks are famous throughout the United States.  
6

7  
8           16. Since 2020, GS has worked to build significant goodwill in the  
9 Stündenglass brand in the United States. GS has spent substantial time, money, and  
10 effort in developing consumer recognition and awareness of the Stündenglass brand,  
11 via point of purchase materials, displays, through their websites, attending industry  
12 trade shows, and through social media promotion.  
13

14  
15           17. In fact, Stündenglass Products have been praised and recognized by  
16 numerous online publications, as well as publications directed to the general public.  
17

18           18. Due to the high quality of the brand and products, GS has collaborated  
19 with numerous celebrities and companies to create collaborations for the  
20 Stündenglass products.  
21

22           19. GS sells its products under the Stündenglass Marks to authorized stores  
23 in the United States, including in California. GS has authorized approximately 3,000  
24 stores in the United States to sell its products. As such, Stündenglass branded  
25 products reach a vast array of consumers throughout the country.  
26  
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20. It is because of the recognized quality and innovation associated with the Stündenglass Marks that consumers are willing to pay higher prices for genuine Stündenglass products. For example, a Stündenglass brand Gravity Infuser is priced at retail at \$599.95, while a counterfeit non-Stündenglass Gravity Infuser with the fake Stündenglass mark is being sold for a range of \$199 to \$600.

21. It is exactly because of their higher sales value that Stündenglass branded products are targeted by counterfeiters. The counterfeiters tarnish the Stündenglass brand by unlawfully selling Gravity Infusers that have identical, or nearly identical, versions of the Stündenglass Marks affixed to products that are made with inferior or different materials, thereby leading to significant illegitimate profits by GAITH SLIKA and MATANOOS NASSAR, such as the Defendants in the instant case.

22. In essence, the Defendants mislead consumers by selling in their stores low grade products that take a free ride on the goodwill of the Stündenglass brand, and in turn, the Defendants reap ill-begotten profits. The Defendants' offering for sale of counterfeit Stündenglass products contributes to the complete flooding of the marketplace with Stündenglass counterfeit products, which results in lost sales and damages to GS and irreparable harm to the Stündenglass brand's image.

23. Moreover, GS offers a 10-year warranty on its products, and when the

1 counterfeit products break or need repair, innocent purchasers learn that they do not  
2 have a warranty on the goods, tarnishing GS's public image.

3  
4 24. The sale of the counterfeit products also cause harm to GS in that  
5 legitimate store owners will not purchase authentic Stündenglass Gravity Infusers  
6 when stores selling counterfeit products are selling products which appear to be  
7 identical and at half the price which authentic products can be sold.  
8

9  
10 25. Unfortunately, the current U.S. marketplace is saturated with counterfeit  
11 Stündenglass products – just like those GAITH SLIKA and MATANOOS NASSAR,  
12 through their store, SHERMAN SMOKE SHOP, is offering for sale. As such, GS  
13 has been forced to scrupulously enforce its rights in order to protect the Stündenglass  
14 Marks against infringement. By exercising its Enforcement Rights, GS has  
15 proactively and successfully policed the unauthorized use of the Stündenglass Marks  
16 and/or counterfeit Stündenglass branded products nationwide. GS has had to bear  
17 great expense to seek out and investigate suspected counterfeiters in GS's attempt to  
18 clean up the marketplace.  
19  
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21

## 22 **Defendants' Counterfeiting and Infringing Activities**

23  
24 26. The Defendants operate a retail smoke shop through which they sell  
25 water pipes, cigarettes, electronic cigarettes, vaporizers, tobacco, and other smoking  
26 related devices.  
27  
28



1           27.     The Defendants have offered for sale counterfeit Stündenglass products  
2 with the Stündenglass trademark and without the consent of GS. In fact, they have  
3 offered counterfeit Gravity Infusers bearing imitations of the Stündenglass  
4 Trademarks that were not made or authorized by GS. These are hereinafter the  
5 “Counterfeit Goods.”  
6

7  
8           28.     Nevertheless, the Defendants have offered for sale in commerce the  
9 Counterfeit Goods, specifically, the Defendants have offered for sale reproductions,  
10 counterfeits, copies and/or colorable imitations of one or more of the Stündenglass  
11 Marks (hereinafter the “Infringing Marks”), detailed above.  
12

13  
14           29.     The Defendants have, without the consent of GS, offered for sale in their  
15 store, the Counterfeit Goods bearing the Infringing Marks, bearing the likeness of the  
16 Stündenglass Trademarks in the United States.  
17

18           30.     The marks affixed to the Counterfeit Goods that the Defendants have  
19 offered for sale are spurious marks which are identical with, or substantially  
20 indistinguishable from, the Stündenglass Trademarks. The marks on the Counterfeit  
21 Goods are in fact counterfeit marks as defined in 15 U.S.C. § 1116(d).  
22

23  
24           31.     Moreover, the products upon which the Counterfeit Marks are affixed  
25 are almost identical to authentic products, so the offering for sale of the almost  
26  
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1 identical products with indistinguishable marks causes confusion in the marketplace  
2 among consumers.

3  
4 32. In the ongoing investigation into the sales of counterfeit products  
5 bearing the fake Stündenglass Marks, SHERMAN SMOKE SHOP offered for sale  
6 Counterfeit Goods.

7  
8 33. Specifically, on June 2, 2022, GS's investigator attended SHERMAN  
9 SMOKE SHOP's location, which was open to the public, and observed that it had an  
10 excess of/a Gravity Infuser(s) which appeared to display each of the Stündenglass  
11 Marks. The investigator purchased a Gravity Infuser with Stündenglass Marks  
12 affixed to it, from SHERMAN SMOKE SHOP, for a cost of \$450.00, charged to the  
13 account of GS's investigator. Upon physical inspection by GS' investigator, the  
14 product was found to be a counterfeit product in that it displayed the Infringing  
15 Marks.  
16  
17

18  
19 34. Attached hereto as Exhibit "B" are the photographic examples of the  
20 Defendants use of the Infringing Marks, taken from the Counterfeit Good. As seen  
21 in the pictures, the Counterfeit Good contained all three of GS's marks on it: U.S.  
22 Trademark Registration Number 6,633,884; U.S. Trademark Registration Number  
23 6,174,292; and U.S. Trademark Registration Number 6,174,291. The Defendants use  
24 of the Counterfeit Marks is substantially indistinguishable, if not identical, to GS's  
25 Marks.  
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1           35. GAITH SLIKA and MATANOOS NASSAR authorized, directed,  
2 and/or participated in SHERMAN SMOKE SHOP's offer for sale, in commerce, of  
3 the Counterfeit Goods. GAITH SLIKA and MATANOOS NASSAR's acts were a  
4 moving, active, and conscious force behind SHERMAN SMOKE SHOP's  
5 infringement of the Stündenglass Trademarks.  
6

7  
8           36. The Defendants' use of the counterfeit Stündenglass Trademarks began  
9 after the registration of the Stündenglass Trademarks. Neither GS, nor any of its  
10 authorized agents, have consented to the Defendants' use of the Stündenglass  
11 Trademarks, or any use of reproductions, counterfeits, copies and/or colorable  
12 imitations thereof.  
13

14  
15           37. The unauthorized offering for sale by SHERMAN SMOKE SHOP,  
16 under the authority, direction and/or participation of GAITH SLIKA and  
17 MATANOOS NASSAR, of the Counterfeit Goods was an unlawful act in violation  
18 of the Lanham Act, 15 U.S.C. § 1114 and 15 U.S.C. § 1125(a).  
19

20  
21           38. The offer for sale by the Defendants of the Counterfeit Goods bearing  
22 the Infringing Marks has caused GS to suffer losses and is likely to cause damage to  
23 the goodwill and reputation associated with the Stündenglass Trademarks, which are  
24 owned by GS.  
25

26  
27           39. SHERMAN SMOKE SHOP's use of the Stündenglass Marks includes  
28

1 displaying to offer for sale unauthorized copies of Counterfeit Stündenglass branded  
2 products. SHERMAN SMOKE SHOP's offering to sell the Stündenglass counterfeit  
3 products, bearing the Infringing Marks in this manner, was, and is, likely to cause  
4 confusion or to cause mistake and/or deceive consumers who purchase the  
5 Counterfeit Goods.  
6

7  
8 40. SHERMAN SMOKE SHOP used images and names identical to or  
9 confusingly similar to the Stündenglass Marks, to confuse customers and aid in the  
10 promotion and sales of Counterfeit Goods under the Infringing Marks. The  
11 Infringing Marks affixed to the Counterfeit Goods that SHERMAN SMOKE SHOP  
12 has offered for sale are confusingly identical or similar to the Stündenglass Marks  
13 that GS affixes to its Gravity Infusers. The Counterfeit Goods and GS's goods are  
14 both gravity infusers, and marks identical or confusingly similar to the Stündenglass  
15 marks appear on the Infringing Goods.  
16  
17

18 41. The Defendants' Infringing Goods travel in identical channels of trade  
19 and are sold to identical consumers as Stündenglass genuine goods.  
20

21 42. The Gravity Infusers that SHERMAN SMOKE SHOP sells and offers  
22 for sale under the Infringing Marks are made of substantially inferior and/or different  
23 materials as compared to genuine Stündenglass brand products.  
24

25  
26 43. SHERMAN SMOKE SHOP has offered for sale its water pipes under  
27 the Infringing Marks through its retail convenience store.  
28

1           44. SHERMAN SMOKE SHOP, GAITH SLIKA, and MATANOOS  
2 NASSAR's infringing acts as alleged herein have caused and are likely to cause  
3 confusion, mistake, and deception among the relevant consuming public as to the  
4 source or origin of the Counterfeit Goods sold by SHERMAN SMOKE SHOP, and  
5 are likely to deceive, and have deceived, the relevant consuming public into  
6 mistakenly believing that the Counterfeit Goods sold by SHERMAN SMOKE SHOP  
7 originate from, and are associated or affiliated with, or otherwise authorized by GS.  
8  
9

10           45. SHERMAN SMOKE SHOP, GAITH SLIKA, and MATANOOS  
11 NASSAR's acts are willful with the deliberate intent to trade on the goodwill of the  
12 Stündenglass Marks, cause confusion and deception in the marketplace, and divert  
13 potential sales of the Plaintiff's Gravity Infusers to SHERMAN SMOKE SHOP. The  
14 Defendants, as merchants of tobacco shop goods, are held to the standard of having  
15 specialized knowledge in the tobacco shop industry. It is readily apparent that the  
16 Defendants, as merchants, have failed to conduct any reasonable inquiry into the  
17 authenticity of the goods sold by their shop and have acted with at least willful  
18 blindness as to GS's intellectual property rights in the Stündenglass Marks. Here, the  
19 Defendants sold a counterfeit product purporting to be Cookies X Stündenglass  
20 gravity infuser for \$450.00 whereas the authentic product retails for \$599.95.  
21 Additionally, the product sold by the Defendants was black in color, whereas the  
22 authentic product exclusively comes in a sky-blue color. Finally, the product sold by  
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1 the Defendants lacked the authentication sticker which the Plaintiff has stated on its  
2 website is present on all authentic Stündenglass products.

3  
4 46. SHERMAN SMOKE SHOP, GAITH SLIKA, and MATANOOS  
5 NASSAR's acts have caused damage and immediate irreparable harm to GS, the  
6 Stündenglass Marks, and to its valuable reputation and goodwill with the consuming  
7 public for which GS has no adequate remedy at law.  
8

9  
10 47. As a proximate result of the unfair advantage accruing to SHERMAN  
11 SMOKE SHOP, GAITH SLIKA, and MATANOOS NASSAR's business from  
12 deceptively trading on GS's advertising, sales, and consumer recognition,  
13 SHERMAN SMOKE SHOP, GAITH SLIKA, and MATANOOS NASSAR have  
14 made profits and gains to which they are not in law or equity entitled.  
15

16  
17 48. The injuries and damages sustained by GS has been directly and  
18 proximately caused by SHERMAN SMOKE SHOP, GAITH SLIKA, and  
19 MATANOOS NASSAR's offers for sale of their goods bearing infringements or  
20 counterfeits of the Stündenglass Marks.  
21

22  
23 49. Through such business activities, SHERMAN SMOKE SHOP, GAITH  
24 SLIKA, and MATANOOS NASSAR purposefully derived direct benefits from their  
25 interstate commerce activities by targeting foreseeable purchasers in the State of  
26 California, and in doing so, have knowingly harmed GS.  
27  
28

1           50. Furthermore, the sale and distribution of Counterfeit Goods by  
2 SHERMAN SMOKE SHOP has infringed upon the above-identified federally  
3 registered trademarks.  
4

5           51. The spurious marks or designations used by SHERMAN SMOKE  
6 SHOP in interstate commerce are identical with, or substantially indistinguishable  
7 from, the Stündenglass Marks on goods covered by the Stündenglass Marks. Such  
8 use therefore creates a false affiliation between SHERMAN SMOKE SHOP, GS, and  
9 the Stündenglass Marks.  
10

11           52. Due to the actions of SHERMAN SMOKE SHOP, GAITH SLIKA, and  
12 MATANOOS NASSAR, GS has been forced to retain the undersigned counsel and  
13 pay the costs of bringing an action forward. SHERMAN SMOKE SHOP, GAITH  
14 SLIKA, and MATANOOS NASSAR should be responsible for paying GS's  
15 reasonable costs of the action.  
16

17           53. SHERMAN SMOKE SHOP, GAITH SLIKA, and MATANOOS  
18 NASSAR's acts have damaged, and will continue to damage GS, and GS has no  
19 adequate remedy at law.  
20

21           54. Moreover, SHERMAN SMOKE SHOP, GAITH SLIKA, and  
22 MATANOOS NASSAR's wrongful acts will continue unless enjoined by the Court.  
23 Accordingly, SHERMAN SMOKE SHOP, GAITH SLIKA, and MATANOOS  
24

1 NASSAR must be restrained and enjoined from any further counterfeiting or  
2 infringement of the Stündenglass Marks.

3  
4  
5 **Count One**  
6 **Federal Trademark Counterfeiting and Infringement, 15 U.S.C. § 1114**

7  
8 55. The Plaintiff avers Paragraphs 1 through 54, which are stated above and  
9 incorporate the allegations therein, as though they are fully restated in this Count by  
10 reference.

11  
12 56. GS owns the federally registered Stündenglass Trademarks, as set forth  
13 in more detail in the foregoing paragraphs.

14  
15 57. The Defendants, without authorization from GS, have used in commerce  
16 a spurious designation that is identical with, or substantially indistinguishable from,  
17 the Stündenglass Trademarks on the same goods covered by the Stündenglass  
18 Trademarks.

19  
20  
21 58. The Defendants' unauthorized use of counterfeit marks of the registered  
22 Stündenglass Trademarks on and in connection with the Defendants' offer for sale in  
23 commerce is likely to cause confusion or mistake in the minds of the public.

24  
25 59. The Defendants' conduct as alleged herein is willful and intended to  
26 cause confusion, mistake, or deception as to the affiliation, connection, or association  
27



of the Defendants, with GS or the Stündenglass Trademarks.

60. The Defendants' acts constitute willful trademark infringement in violation of Section 32 of the Lanham Act, 15 U.S.C. § 1114.

61. The Defendants' actions constitute the use by the Defendants of one or more "counterfeit mark(s)" as defined in 15 U.S.C. § 1116(d)(1)(B).

62. The Defendants' use in commerce of the counterfeit Stündenglass Trademarks has resulted in lost profits and business to GS, which are difficult to determine. The Defendants have also, by selling counterfeit Stündenglass products, caused considerable damage to the goodwill of the Stündenglass Trademarks, and diminished the brand recognition of the Stündenglass Trademarks by introducing counterfeit products into the marketplace.

63. By reason of the foregoing, the Plaintiff is entitled to, among other relief, injunctive relief, an award of statutory damages, and costs of the action under Sections 34 and 35 of the Lanham Act, 15 U.S.C. §§ 1116, 1117, together with prejudgment and post-judgment interest.

**Count Two**  
**Federal False Designation of Origin 15 U.S.C. § 1125(a)**

64. The Plaintiff avers Paragraphs 1 through 54, which are stated above and incorporate the allegations therein, as though they are fully restated and incorporated

1 in this Count by reference.

2 65. GS owns the federally registered Stündenglass Trademarks, as set forth  
3 in more detail in the foregoing paragraphs.  
4

5 66. The Defendants, without authorization from GS, have used in commerce  
6 spurious designations that are identical with, or substantially indistinguishable from,  
7 the Stündenglass Trademarks on the same goods covered by the Stündenglass  
8 Trademarks.  
9

10 67. The Defendants' unauthorized use of counterfeit marks of the registered  
11 Stündenglass Trademarks on and in connection with the Defendants' offers for sale  
12 in commerce is likely to cause confusion or mistake in the minds of the public.  
13  
14

15 68. The Defendants' unauthorized use in commerce of the Stündenglass  
16 Trademarks as alleged herein constitutes use of a false designation of origin and  
17 misleading description and representation of fact in violation of Section 43(a) of the  
18 Lanham Act, 15 U.S.C. § 1125(a).  
19  
20

21 69. The Defendants' conduct as alleged herein is willful and is intended to,  
22 and is likely to, cause confusion, mistake, or deception as to the affiliation,  
23 connection, or association of the Defendants, with GS or the Stündenglass  
24 Trademarks.  
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70. The Defendants' conduct as alleged herein is causing immediate and irreparable harm and injury to GS, and to the goodwill and reputation of the Stündenglass Trademarks. Moreover, it will continue to cause damage to GS and confuse the public unless enjoined by this Court.

71. GS has no adequate remedy at law.

72. By reason of the foregoing, the Plaintiff is entitled to, among other relief, injunctive relief, an award of statutory damages, and costs of the action under Sections 34 and 35 of the Lanham Act, 15 U.S.C. §§ 1116, 1117, together with prejudgment and post-judgment interest.

### **PRAYER FOR RELIEF**

WHEREFORE, the Plaintiff, GS HOLISTIC, LLC, respectfully requests the following relief against the Defendants, as follows:

1. With regard to Plaintiff's Count I for trademark infringement:
  - a. Statutory damages under 15 U.S.C. § 1117(c);
  - b. Costs of suit; and
  - c. Joint and several liability for GAITH SLIKA, and other officers, and directors, for the knowing participation in the counterfeiting activities of G&M TOBACCO INC.

1           2.     With regard to Plaintiff's Count II for false designation and unfair  
2 competition:

- 3                   a.   Disgorgement of profits under 15 U.S.C. § 1117(a);  
4  
5                   b.   Treble damages under 15 U.S.C. § 1117(b);  
6  
7                   c.   Costs of suit; and  
8  
9                   d.   Joint and several liability for GAITH SLIKA, and other officers, and  
10                   directors, for the knowing participation in the counterfeiting  
11                   activities of G&M TOBACCO INC.  
12

13           3.     Preliminarily and permanently enjoining G&M TOBACCO INC and its  
14 agents, employees, officers, directors, owners, representatives, successor companies,  
15 related companies, and all persons acting in concert or participation with it from:  
16

- 17                   a.   The import, export, making, manufacture, reproduction, assembly,  
18                   use, acquisition, purchase, offer, sale, transfer, brokerage,  
19                   consignment, distribution, storage, shipment licensing, development,  
20                   display, delivery, marketing, advertising or promotion of the  
21                   counterfeit Stündenglass product identified in the Complaint and any  
22                   other unauthorized Stündenglass product, counterfeit, copy or  
23                   colorful imitation thereof;  
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1           4. Pursuant to 15 U.S.C. § 1116(a), directing G&M TOBACCO INC to  
2 file with the Court and serve on the Plaintiff's within thirty (30) days after issuance  
3 of an injunction, a report in writing and under oath setting forth in detail the manner  
4 and form in which G&M TOBACCO INC has complied with the injunction;  
5

6           5. For an order from the Court requiring that the Defendants provide  
7 complete accountings and for equitable relief, including that the Defendants disgorge  
8 and return or pay their ill-gotten gains obtained from the illegal transactions entered  
9 into and/or pay restitution, including the amount of monies that should have been  
10 paid if the Defendants had complied with their legal obligations, or as equity requires;  
11  
12

13           6. For an order from the Court that an asset freeze or constructive trust be  
14 imposed on all monies and profits in the G&M TOBACCO INC's possession, which  
15 rightfully belong to the Plaintiff;  
16  
17

18           7. Pursuant to 15 U.S.C. § 1118 requiring that the Defendants and all  
19 others acting under the Defendants' authority, at its cost, be required to deliver up to  
20 the Plaintiff for destruction all products, accessories, labels, signs, prints, packages,  
21 wrappers, receptacles, advertisements, and other material in their possession, custody  
22 or control bearing any of the Stündenglass Trademarks.  
23  
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25           8. For any other and further relief as the Court may deem just and  
26 equitable.  
27  
28

**Demand for Jury Trial**

The Plaintiff demands a Jury Trial on all issues so triable.

Date: June 18, 2024

Respectfully submitted,

/s/ Tomas Carlos Leon.

Tomas Carlos Leon

CA Bar #321117

Leon Law LLP

1145 W. 55<sup>th</sup> Street

Los Angeles, California 90037

tommie@leon.law

*Attorney for the Plaintiff*

LEON LAW, LLP